## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO

| In re: Dominica D. Dearing, | ) | Case No. 17-10025-jps              |
|-----------------------------|---|------------------------------------|
|                             | ) |                                    |
| Debtor.                     | ) | Chapter 13                         |
|                             | ) |                                    |
|                             | ) | Judge: Hon. Jessica E. Price-Smith |
|                             | ) |                                    |
|                             | ) | AMENDED NOTICE OF MOTION FOR       |
|                             | ) | RELIEF FROM STAY                   |
|                             | ) | (2120 Cottingham Dr.               |
|                             | ) | Lyndhurst, OH 44124)               |
|                             |   |                                    |

Georgetown of Lyndhurst Condominiums Unit Owners' Association, Inc., has filed papers with the court to obtain relief from stay for the property located at 2120 Cottingham Dr., Lyndhurst, Ohio 44124.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

File with the court a written request for a hearing, or if the court requires a written response, an answer, explaining your position on or before June 15, 2017, at: Clerk of Court, Howard M. Metzenbaum U.S. Courthouse, 201 Superior Avenue, Cleveland, Ohio 44114.

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Lindsey A. Wrubel, Esq. Ott & Associates Co., LPA 1300 E. 9<sup>th</sup> St., Suite 1520 Cleveland, OH 44114

Lee. R. Kravitz, Esq. Law Offices of Lee R. Kravitz 4508 State Rd. Cleveland, OH 44109 Attorney for Debtor

John E. Codrea, Esq. Manley Deas Kochalski PO Box 165028 Columbus, OH 43216-5028 Attorney for Creditor, Wells Fargo Bank, NA

Craig H. Shopneck, Trustee 200 Public Square, Suite 3860 Cleveland, Ohio 44114-2321 Ch13shopneck@ch13cleve.com

A hearing at the Howard M. Metzenbaum U.S. Courthouse, 201 Superior Avenue, Cleveland, Ohio 44114, will be scheduled at a later time.

Other steps required to oppose a motion or objection under local rule or court order.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

## SUBMITTED BY:

## Respectfully submitted,

By: /s/ Lindsey A. Wrubel

AMANDA A. BARRETO (0084902) LINDSEY A. WRUBEL (0092993)

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Attorney for Movant, Georgetown of
Lyndhurst Condominiums Unit Owners'
Association, Inc.

## **CERTIFICATE OF SERVICE**

I certify that on this 26th day of May, 2017, copies of this Notice of Motion for Relief from the Automatic Stay and Hearing was served by mailing the same by ordinary U.S. mail, postage prepaid or electronic mail, to the persons listed below:

Dominica Dearing 2120 Cottingham Dr. Lyndhurst, OH 44124 Debtor

Lee. R. Kravitz, Esq. Law Offices of Lee R. Kravitz 4508 State Rd. Cleveland, OH 44109 <u>leekravitz@sbcglobal.net</u> Attorney for Debtor

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Craig H. Shopneck, Trustee 200 Public Square, Suite 3860 Cleveland, Ohio 44114-2321 Ch13shopneck@ch13cleve.com

/s/ Lindsey A. Wrubel
LINDSEY A. WRUBEL (0092993)